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MURPHY BROADCASTING
101 Turtle Point Court
St. Simons Island, GA 31522
912-638-9404

RECEIVED

MAY 15 2000

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

May 15, 2000

Ms. Magalie Roman Salas, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

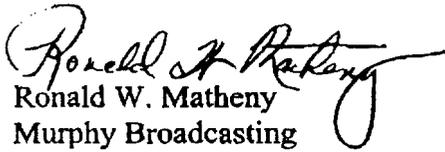
RE: Comments and Counterproposal
MM Docket #00-56

Dear Madam Secretary:

Enclosed please find an original and two copies of the Comments and Counterproposal to be filed in MM Docket #00-56. I hereby verify that the statements contained in the enclosed Counterproposal are true, correct and complete to the best of my knowledge and belief and are made in good faith.

If there are any questions, please do not hesitate to contact me.

Sincerely,


Ronald W. Matheny
Murphy Broadcasting

Enclosures

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List ABCDE

GRAHAM BROCK, INC.

BROADCAST TECHNICAL CONSULTANTS

COMMENTS AND COUNTERPROPOSAL

MM DOCKET #00-56

MUPRHY BROADCASTING

NEW FM RADIO STATION

BYROMVILLE, GEORGIA

May 2000

TECHNICAL EXHIBIT

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COMMENTS AND COUNTERPROPOSAL
MM DOCKET #00-56
MURPHY BROADCASTING
NEW FM RADIO STATION
BYROMVILLE, GEORGIA
May 2000

1. This technical statement and attached exhibits were prepared on behalf of Murphy Broadcasting (“Murphy”). These comments are being submitted in response to a Commission Public Notice, MM Docket # 00-56, in which the allotment of Channel 221A to Eastman, Georgia, has been proposed. As an alternative to the Eastman, Georgia, request, Murphy herein proposes Channel 221A be allotted as the first local audio service to Byromville, Georgia.

Byromville, Georgia, Proposal

2. Byromville, Georgia, is located in northwest Dooly County, Georgia. Based on the 1990 Census, Byromville has a population of 452 persons. Presently, there is no AM or FM service licensed to Byromville. The allotment of Channel 221A would provide first locally licensable service to the community of Byromville.

3. Murphy, therefore, requests that Channel 221A be allotted to Byromville, Georgia, as that community’s first local FM service at geographic coordinates North Latitude 32° 09’ 54” and West Longitude 83° 54’ 46”. This reflects a site restriction of 3.5 kilometers south of the community to avoid shortspacing station WMKS, Channel 222A, Macon, Georgia.¹ From this location, a maximum Class A facility will deliver a 3.16 mV/m contour over the community of Byromville. Attached as Exhibit #1 is a usable area map depicting the usable area for Channel

1) From this proposed location, Channel 221A is shortspaced to the proposed allotment of Channel 221A at Eastman, Georgia.

221A at Byromville, Georgia.² Attached as Exhibit #2 is a §73.207 spacing analysis showing that Channel 221A at Byromville meets the Commission's minimum distance separation requirements to all licensed and applied for facilities.^{3 4}

4. Therefore, Murphy proposes the following changes in the Commission's Table of FM Allotments, §73.202b of the rules:

Byromville, Georgia

<u>Present</u>	<u>Proposed</u>
None	221A

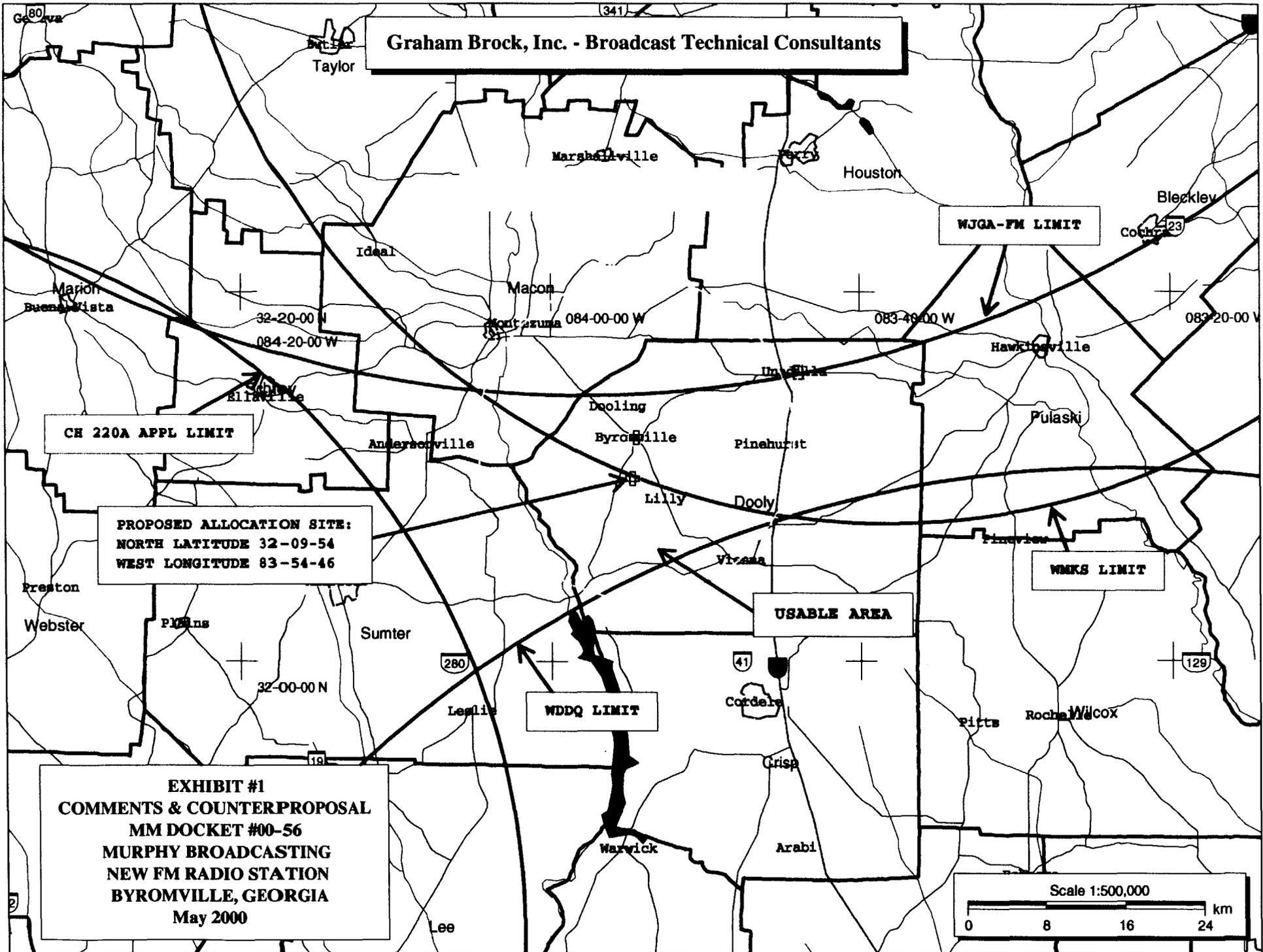
Public Interest Aspects

5. The allotment of Channel 221A in Byromville, Georgia, will provide first locally licensable FM service to the community of Byromville, Georgia. The allotment of Channel 221A to Byromville will provide 1.0 mV/m service to 40,937 persons in 2,553.80 square kilometers. This is an increase of 5,761 persons over the number served by the Eastman, Georgia, request.⁵ When Channel 221A is allotted to Byromville, Georgia, and the filing window for the channel is announced, Murphy will submit, on a timely basis, an application or the appropriate expression of interest permit seeking authority to construct a new FM facility at Byromville, Georgia.

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- 2) The map does not consider the Channel 221A proposal at Eastman , Georgia.
 - 3) With the exception of Channel 221A at Eastman, Georgia.
 - 4) It is noted that this proposal is located near a Channel 6 Television station. However, since the 60 dBu contour of a Class A facility at the proposed coordinates of North Latitude 32° 09' 54", West Longitude 83° 54' 46" does not cross the 47 dBu (Grade B) contour of WCTV, Channel 6, Thomasville, Georgia, no Non-Commercial Educational FM preclusionary study on Channels 218, 219 or 220 is required (MM Docket #96-144).
 - 5) The allotment of Channel 221A at Eastman, Georgia, will provide 1.0 mV/m service to 35,176 persons in 2,485.96 square kilometers.

6. This counterproposal is mutually exclusive with the proposal to allot Channel 221A to Eastman, Georgia. However, Eastman is presently served by WUFF (FM), Channel 248A, and WUFF, 710 kHz, both presently licensed to Eastman.

7. The foregoing comments were prepared on behalf of Murphy Broadcasting, by Graham Brock, Inc., its Technical Consultants. All information contained herein is true and accurate to the best of our belief and knowledge. The information contained in this application was extracted from the NTIA FM database as updated on May 5, 2000, and other sources. We assume no liability for errors or omissions in that database, which may be adverse to the request contained herein.



COMMENTS AND COUNTERPROPOSAL
MM DOCKET #00-56
MURPHY BROADCASTING
NEW FM RADIO STATION
BYROMVILLE, GEORGIA
May 2000

EXHIBIT #2

SPACING STUDY FOR CHANNEL 221A AT BYROMVILLE, GEORGIA
 USING ALLOCATION SITE AS REFERENCE

REFERENCE	CLASS = A	DISPLAY DATES
32 09 54 N	Current Spacings	DATA 05-05-00
83 54 46 W		SEARCH 05-09-00
----- Channel 221 - 92.1 MHZ -----		

Call N. Lat.	Channel W. Lng.	Location	Power	Dist	Azi HAAT	FCC	Margin
WMKS 32 46 26	LIC 222A 83 38 15	Macon CN	3.000 kW	GA 72.32	20.8 100 M	72.0	0.32
	U.S. Broadcasting LP				BLH-19920813KB	54672	
WJGAFM 33 16 37	LIC 221A 83 57 59	Jackson CN	2.150 kW	GA 123.42	357.7 114 M	115.0	8.42
	Earnhart Broadcasting Co., Inc				BLH-19861029KB	18179	
WDDQ 31 08 15	LIC 221A 83 23 41	Adel CN	3.000 kW	GA 124.07	156.6 91 M	115.0	9.07
	Williams Investment Company				BLH-19791009AG	72786	
990224 31 45 18	APP 220A 84 47 26	Cuthbert CN	6.000 kW	GA 94.61	241.4 62 M	72.0	22.61
	American Family Association				BPED-19990224MA	92819	
WUNV 31 40 20	LIC 219A 84 03 27	Albany CN	3.000 kW	GA 56.32	194.0 100 M	31.0	25.32
	Georgia Public Telecomm. Comm				BLED-19900405KB	23919	

AFFIDAVIT AND QUALIFICATIONS OF CONSULTANT

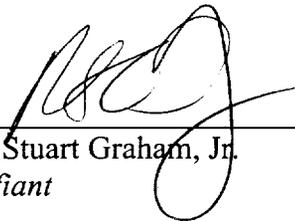
State of Georgia)
St. Simons Island) ss:
County of Glynn)

R. STUART GRAHAM, being duly sworn, deposes and says that he is an officer of Graham Brock, Inc. Graham Brock has been engaged by Murphy Broadcasting to prepare the attached Technical Exhibit.

His qualifications are a matter of record before the Federal Communications Commission. He is a graduate of Auburn University and has been active in Broadcast Engineering since 1972.

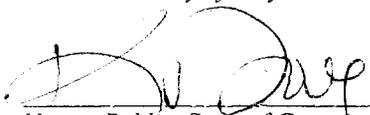
The attached report was either prepared by him or under his direction and all material and exhibits attached hereto are believed to be true and correct.

This the 12th day of May, 2000.



R. Stuart Graham, Jr.
Affiant

*Sworn to and subscribed before me
this the 12th day of May, 2000.*



Notary Public, State of Georgia
My Commission Expires: April 20, 2002